



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
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December 4, 2014

Mr. Jeff Long  
Forest Plan Revision Team Leader  
National Forests in Mississippi  
200 S. Lamar St., Suite 500-N  
Jackson, MS 39201

**RE: EPA Comments on the Final Environmental Impact Statement (FEIS) for the  
Revised Land and Resource Management Plan National Forests in Mississippi.  
CEQ #: 20140252**

Dear Mr. Long:

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) reviewed the Final Revised Land and Resource Management Plan (LRMP) for National Forests in Mississippi. The land and resource management plan is a revision to the Forest Service's 1985 Forest Plan.

The National Forests in Mississippi encompass 1.2 million acres ranging from pine forests in the Gulf Coastal Plain to Upland Hardwoods in Northern Mississippi. The FEIS analyzes the Forest Service's proposal to manage six National Forests in Mississippi for the next 10 to 15 years. The current plan incorporates new information, evolving issues and trends, accounts for changes in national policies and directions and updated views from the public and other stakeholder groups. The intent of the plan is to reflect changing needs and values of the public while focusing on sustainable management of the National Forest System Lands for the future. The forests in the revised plan include: Beinville National Forest; Chickasawhay Ranger District of the De Soto National Forest; De Soto Ranger District of the De Soto National Forest; Delta National Forest; Holly Springs National Forest; Homochitto National Forest; and Tombigbee National Forest.

EPA appreciates the Forest Service's consideration and evaluation of significant amounts of information and input during the preparation of the revised LMRP. The LMRP proposes Goals and Desired Conditions, Objectives, Standards and Guidelines, and Monitoring and Evaluation for the various revision topics, and allocates land to designated Management Areas on 1.2 million acres of national forest land in Mississippi to guide Forest management. We recognize that there are challenges involved in national forest management including; the complexities associated with the LRMP revision topics; statutory and regulatory requirements;

and mixed-land ownership patterns. In addition, we acknowledge the Forest Service's effort to involve the public in land management decisions. The proposed action not only updates the goals and desired conditions, objectives, standards and guidelines, and monitoring requirements but also includes designations for 18 new Special Areas. The new management direction is focused on restoring natural resources and natural processes and creating and maintaining diverse wildlife habitats.

The FEIS addresses the following issues: (1) Native Ecosystem Restoration; (2) Biodiversity and Species Viability; (3) Forest Health; (4) Vegetation Management for Timber; (5) Fire Management; (6) Old Growth; (7) Watersheds and Water, Soils, Aquatic Resources, Riparian Environments; (8) Access Management; (9) Recreation; (10) Special Area Designations; (11) Land Use and Ownership; (12) Climate Change; (13) Minerals Management; and (14) Economic Benefits.

Five alternatives (A, B, C, D and E) are evaluated in the revision of the Land and Resource Management Plan (LRMP or Forest Plan) FEIS for the National Forests in Mississippi. Alternative A is the custodial management alternative which promotes minimal intervention by active management. Alternative B represents no change from the current LRMP. Alternative C is the preferred alternative and is the foundation for the Proposed Plan. Alternative D accelerates the restoration of historical forest conditions and Alternative E emphasizes improved forest health. EPA supports Alternative C the selected preferred alternative.

EPA appreciates the comparison of alternatives description summary. According to the FEIS, the desired conditions of the ecosystem-based management areas do not vary under any of the alternatives considered. However, the rate that these conditions will be achieved and the actions required were the key differences. Alternative A will restore the fewest acres of native ecosystems during the life of the plan. This plan would favor hardwood components. Alternatives B and C assume current funding levels, but Alternative C places more emphasis on the integration of restoration efforts. Alternative D results in an increase in the rate and acreage restored over the life of the plan. Alternative E further increases acreage restored as a result of thinning out more acres of forest resulting in improved forest health and resiliency.

EPA recommends future management of National Forests place emphasis on sustaining the ecological values of healthy forests. This should include: Protection of water quality and yield, sensitive groundwater recharge areas, and undisturbed headwaters of streams and public drinking water supplies. Greater attention to the adverse impacts of logging roads and the value of undisturbed buffer zones along streams and rivers and the designation of wild and scenic rivers. Soil quality maintenance and nutrient stocks that hold the key to current and future forest productivity should also remain a priority. Conservation of forest biodiversity by reducing forest fragmentation (as a result of clear-cuts and roads), avoiding harvest in vulnerable areas such as hardwood or old growth stands and riparian zones, and restoring natural structural complexity to cutover sites.

EPA commends the Forest Service on its attempt to identify and address issues such as climate change and invasive species such as cogon grass and kudzu which are threats to native species, development and population growth, changes in recreational patterns, including the use

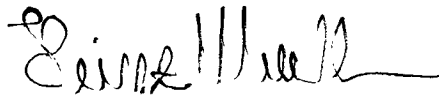
of off road/highway vehicles and land ownership patterns (interspersed of the National Forests with private homes) making consistent best management practices challenging, adaptive management plan to address changing conditions.

EPA understands the need for multiple-use activities and supports management of National Forests that place less emphasis on traditional harvesting and other consumptive uses (e.g., mining) and a greater emphasis on recreation and ecosystem enhancement. We have concerns about the potential biological impacts from these actions including stream sedimentation, loss of habitat, reduction of biodiversity, and species impacts. EPA supports the effective use of BMPs and adherence to forest standards and guideline for water quality. We recommend reducing the nonpoint source pollution of surface and ground waters that can result from forestry activities.

We appreciate the opportunity to review the Revised Land and Resource Management Plan for National Forests in Mississippi. Regarding future management of National Forests, EPA agrees with The Forest Service to implement and track best management practices used to control nonpoint source pollution generated by forestry practices.

Please contact Ken Clark at (404) 562-8282, if you have any questions regarding our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz J. Mueller", with a long horizontal flourish extending to the right.

Heinz J. Mueller, Chief  
NEPA Program Office